From: Fisher, Carla

To: susanh@ida.net

Cc: Weigel, Greg; Kelly Wright; Virginia Monsisco

Subject: RE: RCRA Ponds

Date: Wednesday, September 04, 2013 1:30:00 PM

I left a voicemail for Barbara. Hopefully, she'll get it in a timely manner.

Carla Fisher
RCRA Corrective Action and Permits Team
EPA Region 10

1200 Sixth Ave, Suite 900

Seattle, WA 98101

Phone: 206 553-1756 Fax: 206 553 8509

Email: fisher.carla@epa.gov

From: Susan Hanson [mailto:susanh@ida.net] Sent: Tuesday, September 03, 2013 8:06 PM

To: Fisher, Carla

Cc: Weigel, Greg; Kelly Wright; Virginia Monsisco

Subject: Re: RCRA Ponds

Carla

Thank you for checking. Can we request EPA ask fmc for an inspection? Again today we have received an unusual amount of rain with a lot of flooding.

Susan Hanson

On Sep 3, 2013, at 1:36 PM, "Fisher, Carla" < Fisher. Carla@epa.gov > wrote:

I checked the current (2003) Pond 16S post-closure plan. Section 10.3 of the plan requires inspection of the cap and leak detection system within 48 hours of a 25-year, 24-hour storm event. Section 10.7 requires inspection of the storm water management system within 48 hours of a 25-year, 24-hour storm event.

The draft post-closure plan modification describes a 25-year, 24-hour event as 2.1 inches of rain in 24 hours. According to the National Weather Service website, the precipitation for 8/23 was 0.04 inches and the precipitation for 8/28 was 0.11 inches. So inspections would not have been required.

I have not yet checked the other post-closure plans, but I assume the language is similar.

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Email: fisher.carla@epa.gov

From: Susan Hanson [mailto:susanh@ida.net]
Sent: Thursday, August 29, 2013 7:54 PM

To: Weigel, Greg

Cc: Fisher, Carla; Kelly Wright; Virginia Monsisco

Subject: Re: RCRA Ponds

Ok. I will check with Carla. The Post Closure Plans are not approved. Seems the O&M provisions of both should cover but these were unusual events with a 1/4 of Pocatello's rainfall within hours.

Susan

On Aug 29, 2013, at 2:15 PM, "Weigel, Greg" < Weigel.Greg@epa.gov > wrote:

Susan,

I believe that cap inspection and leachate collection would be covered under the post closure plan and not the UAO. I'll defer to Carla for response to your questions. Thanks,

Greg Weigel
Federal On-Scene Coordinator
EPA Region 10, Emergency Response Unit
950 W. Bannock Street, Boise, ID 83702
208-378-5773 office
208-867-3710 cell

From: Susan Hanson [mailto:susanh@ida.net]
Sent: Thursday, August 29, 2013 1:33 PM

To: Weigel, Greg

Cc: Fisher, Carla; Smith, Andy; Kelly Wright; brian.english@deq.idaho.gov; Rochlin, Kevin;

vannoyi@dhw.idaho.gov; Paden, Norka E - CO 6th

Subject: Re: RCRA Ponds

Greg,

On August 23 and again on August 28 the Pocatello area had a significant

amount of rain. Did FMC conduct any inspections following these events? The Tribes request information whether either of these events impacted the caps, if excess water was identified in the leachate collection systems or if another impacts have been identified.

Susan Hanson

On Aug 28, 2013, at 12:40 PM, Barbara Ritchie <BARBARA.RITCHIE@fmc.com> wrote:

Greg,

As you had directed, FMC is providing a weekly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to work plans you have approved.

Work Performed this week

- Continued 12/7 of one GES unit extracting gas from the east perimeter standpipe at Ponds 18A pursuant to the approved IWP.
- Continued continuous monitoring at three Pond 18A boundary locations during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- Monitoring performed pursuant to the approved work plans during this reporting period:
 - o Pond 9E Cap perimeter surface scan
 - o Phase IV Ponds Cap perimeter surface scan
 - o Pond 15S Cap perimeter surface scan
 - o Pond 17 Cap perimeter surface scan

<u>Problems Encountered:</u>

None.

<u>Unplanned Events Encountered:</u>

A brief power short outage occurred on 8/25/13 at about 11:30 pm when a thunderstorm passed through the area. Auto-dialer notified a pond

operator who responded to the site and re-started the fresh air flow through the GES unit at 18A, without issue.

Work to be performed the following week:

- Continue implementation of the IWP and 12/7 operation of one GES unit at the east perimeter standpipe on Pond 18A.
- Continue continuous monitoring at three Pond 18A boundary locations during periods of gas extraction.
- Other than continuous monitoring during periods of gas extraction at Ponds 18A, no monitoring is scheduled or required pursuant to the approved work plans for next week.
- Begin compilation of August monitoring data for submittal in monthly report 9/4/13 and review in conference call scheduled for Monday, 9/9/13 at 9A PDT/10A MDT/noon EDT.

<RCRA Pond Continuous PH3 Monitoring_8.25.13.xlsx>